

**EXHIBIT E**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THERESA MARIE SIMEONE, Personal Representative of the Estate of Albert Francis Simeone, Jr., Deceased, and THERESA MARIE SIMEONE, In Her Own Right, and MARY ANN LENGYEL, Personal Representative of the Estate of George Lengyel, Deceased, and MARY ANN LENGYEL, In Her Own Right	:	
	:	CIVIL ACTION NO. 02CV4852
	:	
	:	JURY TRIAL DEMANDED
	:	
Plaintiffs,	:	
	:	
v.	:	
BOMBARDIER-ROTAX GmbH, et al.	:	
	:	
Defendants.	:	

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**DEFENDANTS BRP-ROTAX GmbH & Co. KG f/k/a BOMBARDIER-ROTAX GmbH &  
Co. KG'S AND BOMBARDIER INC.'S  
VOIR DIRE QUESTIONS**

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Robert J. Kelly, Esq.  
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Attorneys for Defendants

and

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The Curtis Center-Suite 1130 East  
Independence Square West  
Philadelphia, PA 19106

1. Tell us your age.
2. Are you married?
3. Describe all formal education after high school, including any graduate Degrees.
4. Describe all military service, including branch of service and dates of active duty, years of service.
5. Describe your current employment, if any. If none, please describe your last employment.
6. If married, is your spouse employed? If so, in what manner and for whom is he/she employed?
7. Do you have any children? If so, how many and what ages?
8. If any of your children are employed, in what capacity are they employed?
9. Have you, any family member or friend, ever been employed by the following:

BRP-Rotax GmbH & Co. KG f/k/a Bombardier-Rotax GmbH & Co. KG; Bombardier Inc.; any Interplane entities; Jersey Central Power & Light; First Energy Corporation; Pennsylvania Electric Co.; GPU Inc.; GPU Energy Inc.; Metropolitan Edison; Solomon Chrysler Dodge, Inc. (Charmichael, PA); Horn's Outdoor Center, Inc. (Mt. Bethel, PA); Dave's Repair Service (Williamsport, PA); Barris Supply (West Middlesex, PA); Banik's Sales & Service (Carrolltown, PA); Saylor Honda Seadoo (Altoona, PA); Rini Marine Sales (Beaver Falls, PA); Leisure Equipment, Inc. (Parker Ford, PA); Lockwood Aviation Supply, Inc. (Winter Haven, FL); South Mississippi Light Aircraft (Lucedale, MS); Harley-Davidson, Inc.; Buell Motorcycle Company (East Troy, WI); California Power Systems, Inc.; Sport Cycle Suzuki See-Doo (Leesport, PA); Lombard Motor Sales, Inc. (Monroeville, PA); Bob Thomas Honda Kawasaki (North Huntingdon, PA); Pocono Motorsports (Pocono Lake, PA); Motosports Cycle Shop, Inc. (Hanover, PA); Whitehall Turf Equipment, Inc. (Whitehall, PA); Tri State Sports Center (Honesdale, PA); Highway Marine Services, Inc. (Quakertown, PA; Harrisburg Seaplane Base (Wormleysburg, PA); North American Warehouse, Inc. (Scranton, PA); M.R. Moody Sales & Service (Mars, PA); Kurtz Kawasaki Sno-Jet (Watsontown, PA); Super City Sports Sales (Somerset, PA); Sport 'N Turf (Ephrata, PA); William Dinbokowitz Marine, Inc. (White Hall, PA); Action Equipment (Lock Haven, PA); Larry Troutman Auto Mart (Winfield, PA); Smith Marine (New Britain, PA); Stout's Mower Service (Stroudsburg, PA); A.J.'s (Covington, PA); Conneaut Lake Navigation Co. (Conneaut Lake, PA); PASCH Marine Service (Easton, PA)

If so, please identify who and dates of employment.

10. Please tell us the newspapers and magazines that you subscribe to or read regularly as well as whether you watch TV and your favorite show.
11. Describe any hearing, vision or other health problem or impairment that would make it difficult for you to see or hear the proceedings in this case or would interfere in any way with your ability to serve as a juror in this case.
12. Are you now or have you ever been a party to a lawsuit or court action? If so, please provide details regarding that lawsuit or court action.
13. Is any member of your immediate family a party to a lawsuit or court action, past or present? If so, please specify the nature of the lawsuit or court action.
14. Have you ever been a witness in a trial? If so, please describe the nature of the trial and circumstances.
15. Have you ever been a juror before in a trial? If so, please describe the nature of the trial.
16. Will you be able to follow the legal instructions given to you by the judge, regardless of your feelings as to what the law should be?
17. Do you or any of your immediate family members have a legal background?
18. Do you feel that BRP-Rotax GmbH & Co. KG f/k/a Bombardier-Rotax GmbH & Co. KG and Bombardier defendants must be responsible or partially responsible for plaintiffs' decedents' deaths merely because plaintiffs went through the trouble of instituting this lawsuit?
19. Do you believe that a manufacturer of a product is automatically responsible for someone's injuries or death, regardless of the facts and circumstances of the particular case?
20. Are you or any member of your immediate family an aircraft pilot, licensed or otherwise? If so, kindly identify the individual and what type of aircraft the individual(s) has flown?
21. Have you or any member of your immediate family ever flown in an ultralight aircraft or any non-commercial fixed wing aircraft? If so, please identify the circumstances surrounding flight in an aircraft.
22. Do you or any members of your immediate family have a mechanical or engineering background?
23. Describe your hobbies or recreational activities.

24. Are you a member of any club or organization? Please specify.
25. Have you ever participated in a recreational activity which involved some risk of injury? If so,
  - a) Kindly identify the recreational activity;
  - b) Date of participation.
27. Do you or any member of your immediate family own or use a Rotax or Bombardier product such as a recreational vehicle (i.e., Sea Doo or Ski Doo or engine in an ultralight aircraft)?
28. Have you or any member of your immediate family ever had any adverse dealings with Bombardier Inc. or another Canadian company? If yes, would that affect your ability to be impartial?
29. Have you or any member of your immediate family ever had any adverse dealings with BRP-Rotax GmbH & Co. KG f/k/a Bombardier-Rotax GmbH & Co. KG or another Austrian company? If yes, would that affect your ability to be impartial?
30. Do you believe that a consumer has more rights than a manufacturer?
31. Have you or any member of your immediate family ever heard or read anything about Rotax, Bombardier Inc. or, specifically, Bombardier/Rotax engines which would affect your ability to be impartial?
32. Have you or any member of your immediate family ever been associated with a consumer rights group? If so, which one and when?
33. Are you prepared to judge this case in a fair and impartial manner recognizing that the rights and interests of an individual such as the decedents and plaintiffs are no greater nor lesser than the rights and interests of a corporations such as Rotax and Bombardier Inc.?
34. Have you or any member of your immediate family ever been involved in a personal injury, motor vehicle, recreational vehicle or on the job accident. If so, please describe.
35. Have you or any member of your immediate family ever owned, operated, ridden or presently own an aircraft or recreational vehicle? If so:
  - a) Kindly identify the individual and the manufacturer of the aircraft or recreational vehicle;
  - b) When did you own the aircraft or recreational vehicle or when did you operate it; Were you a passenger or pilot/driver;

- c) Will this affect your ability to be impartial;
36. Have you or any member of your immediate family or any close friend or relative ever been involved in an accident involving an aircraft or recreational vehicle? If so:
- a) Identify the individual and the aircraft/recreational vehicle;
  - b) When did the accident occur;
  - c) What type of injuries were sustained;
  - d) Will this affect your ability to be impartial.
37. Have you or any member of your immediate family even been injured or killed while as a result of participating in a recreational activity? If so,
- a) Kindly identify the individual.
  - b) When did the accident occur?
  - c) Briefly describe the accident.
  - d) What types of injuries were sustained.
  - e) Will this affect your ability to be impartial.
38. Do you have any strong feelings or opinions about ultralight aircraft or general aviation aircraft which will affect your ability to be impartial?
39. Do you have any bias or prejudice for or against the manufacturer or distributor of ultralight aircraft engines or the manufacturer or distributor of other recreational vehicles' engines ?
40. Have you or any member of your immediate family or any close friend or relative ever been hospitalized for a serious injury or died as a result of an accident ? If so,
- a) Kindly identify the individual.
  - b) When did the accident occur?
  - c) Briefly describe the accident.
  - d) What types of injuries were sustained.
  - e) Will this affect your ability to be impartial.

41. Have you ever heard about an ultralight aircraft accident involving Francis Simeone and/or George Lengyel?
42. Do you know or have any relationship with the following individuals:

Robert J. Kelly  
Suna Lee  
Kelly Waters  
Christopher McClanahan  
Arthur Wolk  
Allan Mattioni  
Christopher Cerski

Francis Simeone  
George Lengyel  
Theresa Marie Simeone  
Maryann Lengyel  
Francis and Theresa Simeone's children  
George and Maryann Lengyel's children

Ralph Mandarino  
William Losey  
Joseph Yatsko  
Ben Dawson  
Marcus Nataniel Ruff  
Terry Lee McCandles  
Richard Fuess  
Ronald G. Madison

Donald E. Sommer  
Harold C. Newbold  
Mark Seader  
Royal Bunin  
Kas Osterbuhr  
Kenneth Orloff  
Manual Raefsky  
Weldon Garrelts  
Roger Stallkamp

Respectfully submitted,

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER  
Attorneys for Defendant BRP-Rotax GmbH & Co. KG f/k/a Bombardier-  
Rotax GmbH & Co. KG and Bombardier Inc.

BY: /s/ Robert J. Kelly  
ROBERT J. KELLY, ESQ.

DATED: October 6, 2005